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RCOM SECTION

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August 14, 1995

MR RUBEN MCCULLERS
ENVIRONMENTAL SCIENTIST
U.S. EPA, REGION VII
726 MINNESOTA AVENUE
KANSAS CITY KANSAS 66101

RE: CONSENT AGREEMENT (VII-92-H-0008 AND VII-93-T-499-E)
PROGRESS REPORT; 5/1/95 THRU 8/1/95

Dear Ruben:

This Progress Report is being provided pursuant to paragraph 8 of the First Modification to Consolidated Consent Agreement and Order, as referenced above.

1. New Facility: The plant layout and conceptual plant and office design work was completed with the help of McClier Consulting Company. We reached an agreement with Korte Construction Company, Highland, Illinois, in April to do the architectural design and construction management. Weekly planning sessions with Korte have focused on integrating the building with the equipment layout and reducing costs.

Paint: We have continued to work with two equipment suppliers to further define our requirements and integrate the material handling and finish paint with the E-Coat process. Evaluation of the previously E-Coated parts continues.

Evaluation of applicable top coat technologies continues. Current efforts are focused on the long-term cost effectiveness of powder versus low VOC spray versus water borne spray. We should have a decision in (2) months.



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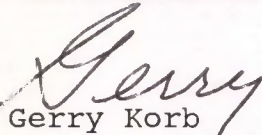
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2. Closure Plan: The Closure Plan has been implemented as planned. The incinerator and pad were removed and disposed of at the Laidlaw Lone Mountain facility. Contaminated soils beneath the pad and storage areas were excavated and disposed of at a local landfill. The Closure Report was completed and sent to Missouri Department of Natural Resources August 2.
3. S.E.P. Plan: The SEP Plan was submitted by Schreiber, Grana & Yonley on Knapheide's behalf to EPA, May 5. We received EPA's verbal approval of the Plan June 4, and formal approval July 14. The on site audit was performed July 10, by Schreiber, Grana & Yonley. Schreiber, Grana & Yonley is currently assembling the audit report.
4. S.E.P.S: The four SEP's listed in the Consolidated Consent Agreement and Consent Order were described in a report to EPA dated May 5. EPA's response to the SEP's was received July 14. We are in the process of responding to the questions and comments raised by EPA.
5. QUALIFYING EXPENSES: None submitted at this time.

If you have any questions or I can be of further help, please call.

Sincerely,

THE KNAPHEIDE MFG. CO.


Gerry Korb

Vice President Operations

GWK:dd

cc: Sandra Oberkfell, Esq.
Dan Punzak, IEPA
Tom Judge, MDNR
Bryce Butler, Knapheide